

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 25-cv-21596-ALTMAN/LETT

THE DONALD J. TRUMP REVOCABLE
TRUST, *et al.*,

Plaintiffs,

v.

CAPITAL ONE, N.A.,

Defendant.

/

JOINT MOTION TO EXTEND INITIAL DISCLOSURES DEADLINE

Plaintiffs The Donald J. Trump Revocable Trust, DJT Holdings, LLC, DJT Holdings Managing Member, LLC, DTTM Operations, LLC, and Eric Trump (“Plaintiffs”) and Defendant Capital One, N.A. (“Capital One”) (collectively, the “Parties”) jointly move to extend their deadline to exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26(a). In support thereof, the Parties state as follows:

1. On April 7, 2025, Capital One removed the above-captioned action to this Court. ECF No. 1.
2. On April 25, 2025, the Parties held a scheduling conference pursuant to Federal Rule of Civil Procedure 26(f). ECF No. 11 at 1.
3. On April 29, 2025, the Parties filed their Joint Scheduling Report and Joint Proposed Scheduling Order and proposed a June 25, 2025 deadline to exchange initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1). ECF No. 11-1 at 2.
4. On April 30, 2025, the Court entered the Order Setting Trial and Pre-Trial Schedule, Requiring Mediation, and Referring Certain Matters to Magistrate Judge (the

“Scheduling Order”) in this action but did not set a deadline for the Parties to exchange initial disclosures. ECF No. 14.

5. Under the Federal Rules of Civil Procedure, the Parties must exchange initial disclosures “at or within 14 days after the [P]arties’ Rule 26(f) conference unless a different time is set by stipulation of court order.” Fed. R. Civ. P. 26(a)(1)(C). Both Local Rule 26.1(b) and the Scheduling Order are silent regarding stipulations to extend the initial disclosures deadline. *See* S.D. Fla. Loc. R. 26.1(b); ECF No. 14 at 3.

6. Accordingly, the Parties have filed this Joint Motion and believe that good cause exists for the Court to extend the initial disclosures deadline to June 25, 2025.

7. *First*, the Parties previously agreed that a June 25, 2025 deadline to exchange initial disclosures when they held their scheduling conference and filed their joint scheduling report and proposed scheduling order. ECF No. 11-1 at 2. They based this agreement on reasonable estimates of the time needed to gather relevant information. Based on this agreement, the Parties ask the Court to exercise its discretion and adopt their shared recommendation for a deadline.

8. *Second*, the Parties have not proposed this extension for purposes of delay. An extension will allow the Parties to gather the information required to provide meaningful disclosures to each other. Further, given the relatively modest nature of the time requested, the proposed extension will not prejudice the Court or any party to this action.

9. Accordingly, the Parties have filed this Joint Motion in good faith and believe good cause exists to grant the requested extension.

CONCLUSION

Based on the foregoing, the Parties respectfully request that the Court grant this Joint Motion and extend the initial disclosures deadline to June 25, 2025. A proposed order granting this Joint Motion is attached hereto as **Exhibit A**.

Dated: May 8, 2025

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